

United States Attorney  
Southern District of New York

October 28, 2019

**FILED BY ECF**

The Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
United States Courthouse  
40 Foley Square, Courtroom 1306  
New York, New York 10007

**Re:** *United States v. Ali Sadr Hashemi Nejad*, 18 Cr. 224 (AJN)

Dear Judge Nathan:

On October 2, 2019, the Court endorsed an agreed-upon schedule to brief issues surrounding the email review conducted by the Manhattan District Attorney's Office ("DANY"). Under that schedule, the defendant filed, on October 10, 2019, a motion to suppress and motion to exclude. The Government's response to these motions are due today, October 28, 2019.

The Government writes to request a short extension to file its response. The purpose of the extension is to allow the Government additional time to engage with DANY regarding the search and review at issue, and to address, to the fullest extent possible, the factual issues raised in the defendant's supplemental motions. The defendant opposes this request on the grounds that these motions should be fully briefed and argued at the motion hearing set for November 6, 2019. The Government respectfully submits, however, that an extension to this Thursday, October 31, 2019, would still allow the defense time to file a reply by November 5, 2019, which would permit the Court to hear argument on these motions on November 6, 2019.

Respectfully submitted,

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cc: Defense Counsel (by ECF)